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U.S. District Court

District of New Hampshire  
55 Pleasant Street  
Concord, NH 03301  
<https://www.nhd.uscourts.gov/>

Case Name: Pouget v. Crusco et al

Case Number: 1:22-cv-00382-SE

MOTION TO AMEND COMPLAINT

I, Rochelle Pouget, pro se litigant and Plaintiff, am filing this Motion to Amend on my own behalf and I am a person authorized by court rules to appear on behalf of my minor child. I am filing this Motion on behalf of my minor child as well.

The facts supporting this Motion are:

1. In November 2012, I reported that my husband, who was going through a mental health crisis, assaulted me. I received an injury to my left arm when my husband turned around and grabbed the door to our master bathroom (with his left hand and he was left-handed) and slammed it shut. I did not get my arm out of the way in time and I was in a retreating position when the injury occurred. The reason I was leaving the marriage was due to the fact that my husband was a fraudster, sixteen years older than me, who had defrauded his family, both of his ex-wives before me, me, my mother, his business partner in NH, etc., and I was in fear he would eventually harm me over money, which was a fear my entire family had as well. His own family knew he was unstable and his older brother offered my daughter and me a safe haven in NV if we needed to fly out there to protect ourselves. It was a very serious and dangerous situation to be in and I was alone in a state with no family to help me through it because my husband moved me away from my family and friends, in order to defraud me, abuse me, and keep me isolated from my support system. The entire move from CA to NH in 2006 was based on the lies my husband created to cover up his reckless spending issues.
2. Evidence will prove, my husband James Reid Coburn, had significant addictions issues from the time he was in middle school until the day he died at 66 from cancer. Those addiction issues run deep in his family and his mother was in AA, as was my husband (at times), and his older brother. His older brother still goes to AA and has been attending meetings for decades. My husband only went to AA to find unsuspecting people to defraud and continued to defraud his younger brother, his adult son, and my daughter,

after my divorce was finalized in 2014. He tried to defraud a girlfriend after our divorce too and when she demanded he pay her back, he broke up with her the next day.

3. Evidence will prove, my husband was addicted to alcohol, marijuana, prescription meds, cocaine, trading stocks, etc. He managed to stop drinking and doing drugs by the time I started dating him in 2001, but he could not stop himself from spending way beyond his means and he was willing to do anything to get the material things he craved, to continue the façade that he had it all together.
4. Evidence will prove my husband was well aware that he was a very ill man who wreaked havoc in the lives of the people who loved him and he needed help. My husband knew I was aware of his mental health issues, but after he went to the ER with me, he started seeing a psychiatrist and did not reveal who the psychiatrist was.
5. After the first DV incident where the NBPd refused to investigate my case properly, according to basic protocols, skill levels, trainings, and experience, Chief Brace went on a campaign to destroy everything in my life and he is still doing so to this day. The reason he is doing this will become very clear if he is restrained from having anything to do with my daughter or me, so I can focus on raising her properly, and have my entire divorce case re-investigated by the proper authorities who will actually investigate it according to protocols, trainings, skill levels, and experience.
6. Chief Brace is an appointed official. He took an Oath to do his job to the best of his ability. Evidence will prove he intentionally obstructs justice, neglects women and children, bullies women who are assertive, and is willing to do anything, including tampering with lobby surveillance videos by cutting sections of video and cutting sections of audio, while video is still playing.
7. More recently, in January and February, body cam transcripts and hard evidence of a Sgt. Tim Loveless of the NBPd prove he wrote false statements to make it appear as though I'm making things up and/or crazy, which has been the NBPd's modus operandi since Chief Brace was humiliated that a judge signed a restraining order that he said, "A judge will never sign" after he refused to investigate DV properly and tried to turn the entire thing around on me.
8. Evidence will prove that when I filed a Motion to Compel to get the Original Body Cam evidence from January 26, 2023 and February 1, 2023, the NBPd is trying to block it. I know the Original Body Cam cannot be altered and it proves I was entrapped, denied assistance from a State Trooper, denied medical assistance after I called 911 multiple times from the lobby of the NBPd and my minor child did as well from my vehicle in the

parking lot of the NBPD, and the police report is full of intentional omissions and false statements.

9. I have been under the care of a psychiatrist and a counselor at CMC Behavioral Health in Manchester since 2011 and I was also a patient of Dr. Doug Johnson at the Greenhouse Group in Manchester, NH from 2014 until he retired this year. The Director of CMC Behavioral Health was the first psychiatrist who started seeing me and he prescribed the proper medication to help squash panic attacks. The reason I am still in therapy and getting worse, is due to the corruption and malfeasance that has plagued the NBPD since 2012 when Chief Brace was appointed and the malfeasance in Family Court. I have been fighting hard to protect my daughter and her Constitutional Rights as well as myself and my Constitutional Rights since November 2012, when my life was turned around by the intentional actions and lack thereof, from a Chief of Police who took an Oath to protect citizens who are abused.
10. Chief Brace is an abusive fraud and evidence will prove this. After multiple DV incidents from November 2012 to 2014, weren't investigated properly (intentionally), including my daughter being chased, thrown around, and accidentally choked during her father's fit of rage, I reached out to the DOJ for help. Not only had Chief Brace, Sgt. Masella, Sgt. Aiken, and others created a false narrative of what occurred, they denied my daughter medical care by turning away the ambulance that the 911 operator sent after my daughter was heard stating she had been choked by her father. I had the audio forensically examined because the DOJ refused to do so. I had the lobby videos forensically examined twice by two independent agencies because the DOJ, the HCSO, the County AG, the AG, and the Public Integrity have failed to do so. They have the capability to do so, and had the capability to do so back in 2014, but they refused to have them analyzed properly and an overwhelming amount of evidence that I have been gathering from my case and others after my case, will prove they have obstructed justice intentionally from 2012 on and by doing so, another child ended up abused in a basement for many years, while she was chained up, fed once a day, and had a bowl to go to the bathroom in, while her foster parents and other siblings had full use of the 4500 square foot home. The girl ran away multiple times and the NBPD brushed off her truths the same way they brushed off my truths and my daughters and that poor child suffered unbelievable irreparable emotional trauma. My daughter and I have suffered emotional trauma as well and the thought of Olivia Achokitis suffering down there in those horrendous conditions has brought a whole new level to my PTSD symptoms because I know she had chance of being saved, had the investigators who should have had the lobby videos forensically examined or at the very least demanded Sgt. Aiken, Chief Brace, and every officer involved take a polygraph or resign.

11. John Coughlin is the County AG and Mark Putney was the investigator who failed to investigate the abuses of not only Chief Brace and the NBPd, but another fraudster named Kysa Crusco who is not only a Guardian ad Litem, she is an attorney. Evidence will prove Kysa has been defrauding people, and she routinely writes false statements on affidavits, fails to notify parents of Ex Parte hearings properly, gets marital masters, referees and judges to approve her cases to be needlessly extended, and they increase her fee caps so she can get paid a great deal more than the average GAL, while she intentionally blows off child sexual abuse, physical violence against children, emotional abuse against children and interferes with DCYF investigations and Psychological Evaluations by withholding extremely important information about the parent she is colluding with. Kysa Crusco is getting paid above and beyond what a GAL normally gets paid because she has figured out a way to fleece the citizens in this state and bypass the judicial system to defraud unsuspecting parents and she is using their children to bully the parents into submission. She is a fraud and it has been verified by DCYF and the CAC that children have been abused and she went to great lengths to cover it up, rather than report it, while she was a mandated reporter.
12. Evidence will prove the deception involved in the fraudulent removal of my parental rights (for profit) and how Real Estate Fraud occurred as a result. My daughter and I are on the verge of being evicted due to multiple Real Estate Fraud issues involving multiple people with power. Evidence will prove I was promised by the Hillsborough County Assistant AG that all of my complaints would be investigated by Mark Putney, and that is not the case. The investigation did not include contacting anyone to inquire into the Real Estate Fraud and I learned the County AG's wife, Pamela Coughlin, was the Hillsborough County Registrar when the first act of Real Estate fraud occurred. Others subsequently committed fraud and my house was auctioned off and sold to realtors who are also committing fraud. Not one person in the State of NH will agree to investigate it while my daughter and I suffer the emotional torment of not knowing if our home is going to be stolen from us because nobody was willing to investigate Real Estate Fraud and all the other abuses from 2012 on, which led to the Real Estate Fraud. Evidence will show John Coughlin is an elected official who took an Oath and he is intentionally failing to do the job he was elected to do by the voters of NH. He will not even recuse himself to allow for a proper and thorough investigation.
13. I am a teacher who had to go on permanent medical disability from all of corruption and malfeasance involved in my two year divorce/custody case. The following judges are a few, but not all, of the judges who were involved in my case. Paul Moore (disbarred), Philip Cross (Impeached and enabled to continue preying on innocent families), Bruce Dalpra (resigned after saying, "Who the fuck cares" under his breath while hearing a case. Julie Introcaso resigned after being charged with felony white out issues.

14. In September 2022, after I filed the original request for a restraining order, I found multiple Court Orders in my case and two others involving Kysa Crusco in two other districts, with white out on them. The white out completely obscures what marital masters, referees, and judges wrote, and yet this appears to be acceptable with no explanation. In addition, I learned there are three Court Orders where my parental rights were fraudulently removed, in my case file in Goffstown. One of the Orders, which is the one I received after an Ex Parte hearing was held when I wasn't properly notified, has no received stamp from the Court, yet it has both Referee Cross's signature and Judge Gordon's. A second Court Order has a received stamp in the lower right hand corner with only Philip Cross's signature on it. A third Court Order has the received stamp in the upper right-hand corner and has both Philip Cross's signature and Judge Gordon's. So where did the received stamp go on my copy and the one in the court case file that shows it was served to me? Why are none of the documents signed in my Court Copy by my husband and others who wrote false affidavits. Why are the date stamps the day after my rights were removed instead of the date they were actually removed? I question as to whether or not any of them were really in attendance after everything I've learned about this case and others.
15. When my parental rights were fraudulently removed, I was a teacher with an impeccable reputation. I was teaching kindergarten and had contacted DCYF the day before to report a 2<sup>nd</sup> legitimate child to child molestation incident. The first incident had been verified by the CAC and the State Police and then Kysa and those who are no longer employed at DCYF changed the language from age related to age appropriate, which it definitely was not. As a mother and a teacher, I can tell you the things that were being done were very disturbing and there was and still is a great deal of concern that the child who was involved was being abuse and acting it out on my child. I am a survivor of childhood sexual abuse and my father was not held accountable after causing decades of trauma to his family until he was in his late 70's and early 80's. This is why I am extremely passionate about protecting children from predators who put them in harm's way. My sister and I were not protected because the abuser was protected and our country has had enough of people protecting the abusers. I know my daughter and I have. I know my son and my step-son have as well.
16. Evidence will prove that after my parental rights were removed due to fraud, I was so concerned for my daughter's safety, that I hired two new attorneys I had never met before and paid them \$25k in advance to help me in the four day hearing that I'd been waiting for with all my discovery to prove my husband was a lying conman and he had significant mental health issues that were being covered up by the police, the Guardian, my husband, his attorney, and the Guardian ad Litem's friend Dr. Avery-Leaf, who performed my husband's Court Ordered psychological evaluation. Dr. Avery-Leaf has



since left the state and her crimes against my daughter and me will be addressed in court later, when my daughter and I are out of immediate danger of being evicted due to fraud.

17. Evidence will prove that rather than going to the four-day hearing, my attorneys convinced me to mediate and then orchestrated an unfair (quick) settlement which ultimately led to Real Estate Fraud. Patricia A. Murphy, my husband's attorney, wrote up a Divorce Decree and I was bullied into signing a Quit Claim deed to give up my home. I only agreed to give up my marital residence because I was under extreme duress after having my child stolen from me and after she was put back with the person who routinely failed to supervise her properly over a 6-month period of time while she was being sexually molested. There were conditions that had to be met in order for the Quit Claim Deed to be released to my husband. He had three years (per the court order) to refinance or sell our marital residence.
18. Evidence will prove my husband never even attempted to do so for five years and was in Contempt of Court for not doing so when he died. Unbeknownst to me until he died, Patricia A. Murphy (who was Court Ordered to keep the Quit Claim Deed in Escrow to protect me) somehow decided that was no longer something she needed to do and the Quit Claim Deed was given back to my husband less than a month after our divorce was finalized. The Quit Claim Deed was then tampered with by someone, most likely my husband, but who knows because nobody bothered to investigate this, and Patricia A. Murphy's name was crossed out and my ex-husband's name was inserted. Then the Hillsborough County Registrar's Office allowed him or someone to fraudulently register it without any checks at all, when it is blatantly obvious an Attorney's name is crossed out and my husband's name was handwritten in.
19. From 2019 on, when I learned about the Real Estate Fraud, I had the same attorneys who failed to protect me in mediation. Not only did they set me up with the Quit Claim Deed deal to get their \$25k and move on, they allowed language that Patricia A. Murphy wrote to intentionally destroy my credit because they knew my husband had significant reckless spending issues and was so overextended, he could not refinance. He did not want to sell our home or give it back to me and allow me to make the payments, so he did the next best thing. He tried to force me into bankruptcy, so he wouldn't have to refinance. The reason being, Patricia A. Murphy wrote a statement in the divorce decree stating the my husband wouldn't have to refinance or sell the house if I happened to file bankruptcy, and then my husband stopped making the mortgage payments to destroy my good credit and force me into bankruptcy. I'm stubborn and refused to allow the fraudster to steal my home from me, so I did not file bankruptcy, even though my own attorneys tried to bully me into it to cover up their involvement in the Real Estate Fraud deal. I took the 7 plus year hit and I'm still being affected by it to this day.

20. Evidence will prove that after I realized the Quit Claim Deed was fraudulently registered I went to great lengths to get the proper authorities to undo what had been done. While this was happening, I learned my husband intentionally took my daughter out of his will on his death bed, to cover up Real Estate Fraud and to prevent due process which would have resulted in me getting my marital residence back because I had gathered a plethora of evidence of fraud, obstruction of justice, neglect, financial abuse, etc. Then I learned my husband informed his adult son who had never lived in NH to handle his Estate and he gave him directions to put false claims on the marital residence. My husband owed a substantial amount of unpaid taxes at the time and the house was in total disrepair and worth only \$20k to \$30k above what was owed when he died.
21. Evidence will prove my lender was aware of the fraud with the Quit Claim Deed and they did not want to help me refinance my loan. After attorneys, HAF, and Greenpath financial got involved, Salem Five my lender, finally agreed to a loan modification and it should have been in my name only due to the fact that the Quit Claim Deed was fraudulently registered and was null and void.
22. Unfortunately, Salem Five decided to send me loan documents with my old last name that I had not used for over five years, they put my deceased ex-husband's name on the loan too and insisted the Estate sign off on it. My attorney sent them a letter informing them of their intentional error, but they refused to change the documents to reflect my legal last name, to remove the Estate that had made a fraudulent claim against my marital residence, and they had the wrong date listed on the loan documents.
23. While I was feverishly trying to file Motions in Probate Court, Superior Court, and Federal Court to block the fraudulent auction and sale of my marital residence until I could get a proper evidentiary hearing to expose everything that had been done to my daughter and me, going on ten years now, my lender auctioned off my home to some realtors who are now going to try and flip it because the Real Estate Market went up and my lender could get all the back payments that were included in the loan modification all at once and then they could be done with my loan. Salem Five's attorney listed my home in fraudulently in the Union Leader under the wrong last name and while referencing the wrong deed from 2006, rather than the quit claim deed that was fraudulently registered in 2015, so they committed Real Estate Fraud too. Then the new buyers, who I suspect know the attorneys and/or employees at Salem Five, have filed Court documents to evict my daughter and me and they referenced the wrong deed as well, to get around the fact that my home has been stolen from my daughter and me and Real Estate Fraud, that has yet to be investigated, actually occurred and my daughter and I are being abused and kicked out due to corruption in law enforcement, collusion, and Family Court malfeasance.
24. Since my case started, Alexandra Drake, a former police officers was targeted by Chief Brace and Chief Brace's good friend Sgt. Masella (who was also sued over the sexual

harassment issues) sued the NBPD and was offered a large settlement. Jennifer Watson was then fired and she sued the NBPD and was offered a settlement. My issues with the NBPD started well before those officers had issues with the NBPD and well before Olivia Achokitis was abandoned over and over by the NBPD to suffer in an 8 x 8 dungeon/basement of horror.

With this Motion I am requesting the following relief:

- A. That Chief Brace and Sgt. Loveless of the NBPD be immediately and permanently restrained from having any contact with my daughter or me, and that they be restrained from any involvement in any investigations that might be currently in the works or forthcoming that involve my daughter, me, or my marital residence.
- B. That the Original Body Cam recordings from January 26<sup>th</sup>, 2023, (in their entirety) where I was recorded be reviewed by Office Wynkoop and Officer Marmostein of the NBPD and that they both write their own independent narratives of what was actually said on the recordings with times the listed, without any orders from anyone at the NBPD to alter, omit, or make up information that is not true, in an attempt to obstruct justice.
- C. That the Original Body Cam recordings from January 26<sup>th</sup> 2023, where I was recorded by Officer Wynkoop and Officer Marmostein be released to me immediately, so I can prepare for an evidentiary hearing.
- D. That the Original Body Cam from February 1<sup>st</sup>, 2023 that Sgt. Tim Loveless was wearing be released to me, as Sgt. Tim Loveless abused me and tortured me in the lobby of the NBPD and repeatedly denied me medical care, during a mental health crisis and a serious defective gallbladder issue that has been subsequently dealt with by the emergency removal of my gallbladder.
- E. That Kysa Crusco and County AG John Coughlin be permanently restrained from having any contact with me or my minor child and that they be permanently banned from having anything to do with any investigations that might be in the works or opened up in the future that involve my daughter, me, or my marital residence.
- F. That my divorce decree be stricken from the record and revised as annulled instead, due to ten years of obstruction of justice, neglect, abuse, etc., committed crooked law enforcement officers and those involved in my divorce case who enabled my daughter's life and mine to be destroyed without ever contacting anyone in my husband's own family to verify his long history of abuse.



- G. That DCYF allow me to review the original case files with a Victim's Advocate assigned by the State.
- H. That my daughter be assigned a Victim's advocate by the state.
- I. That those who committed fraud with the Quit Claim Deed at Harmon Law, Salem Five, and 20 Lincoln Drive LLC, be required to either give me my marital residence back, free and clear of any debt owed, after the Quit Claim Deed is removed from the Hillsborough County Registry of Deeds and returned to the Goffstown Courthouse where it should have gone after Patricia A. Murphy retired, or pay \$1,000,000.00 for committing fraud against me and causing my minor child and me a horrendous amount of emotional trauma.
- J. That an evidentiary hearing be set up immediately to allow due process that was denied over and over by the lower courts, while they intentionally enabled abuses against my daughter and me, and repeatedly denied evidentiary hearings to terminate the role of the GAL ad litem, while she was intentionally refusing to do the job she was well paid to do.
- K. That the NBPD pay my daughter and me \$800,000.00 for all the pain and suffering they have caused my daughter and me from November 2012 on, while failing to do a basic investigation into multiple DV incidents when my daughter and I were being repeatedly assaulted and emotionally tortured by my husband and were my daughter ended up being molested repeatedly, due to their negligence and intentional interference in my divorce/custody case.
- L. That Kysa Crusco be required to pay my daughter and me \$800,000.00 for all the pain and suffering she has intentionally caused due to her fraudulent actions.
- M. That Patricia A. Murphy be required to pay my daughter and my \$800,000.00 for all the pain and suffering she caused due to her fraudulent actions.

With GREAT RESPECT for the Constitution of the United States of America, I submit this request.

Respectfully,

  
Rochelle Pouget

Pro Se Litigant on behalf of myself and my minor child  
20 Lincoln Drive  
New Boston, NH 03070

I state that on this date, April 12<sup>nd</sup>, 2023, I am providing the Federal Court Clerk a copy to mail to the defendants. I will pay to have them served in hand if my request to have them restrained from having anything to do with my daughter and me is GRANTED. My daughter and I are in fear of retaliation and have already experienced it multiple times over the past ten years from Kysa Crusco (Crusco Law Offices) and multiple law enforcement officers at the NBPD.

Rochelle Pouget  
Pro Se Litigant

*Rochelle Pouget*

NBPD  
Kysa Crusco  
Patricia Murphy  
John Coughlin  
via DCYF  
Harmon  
Law  
Salem  
Five